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1 2 3 4	KATHLEEN MAYLIN (SBN (SBN 155371) CARA CHING-SENAHA (SBN 298467) JACKSON LEWIS LLP 199 Fremont Street, 10th Floor San Francisco, California 94105 Telephone: (415) 394-9400 Facsimile: (415) 394-9401			
5 6	Attorneys for Defendants NATIONAL RAILROAD PASSENGER CORPORATION dba AMTRAK and JOE DEEL	Y		
7				
8	UNITED STATES I	DISTRICT COURT		
9	NORTHERN DISTRICT OF CALIFORNIA			
10	TVORTILIZATV DISTARC	or of Calli Oktiva		
11	JOHN EARL CAMPBELL,	Case No. C05-05434 MJJ		
12	Plaintiff,	SUPPLEMENTAL DECLARATION OF		
13	v.	CARA CHING-SENAHA IN SUPPORT OF DEFENDANTS' NATIONAL RAILROAD PASSENGER		
14	NATIONAL RAILROAD PASSENGER	CORPORATION'S AND JOE DEELY'S MOTION FOR SUMMARY		
15 16	CORPORATION dba AMTRAK, JOE DEELY, and DOES 1-15, inclusive,	JUDGMENT, OR IN THE ALTERNATIVE, SUMMARY ADJUDICATION		
17	Defendants.	Date: May 22, 2007		
18		Time: 9:30 a.m. Courtroom: 11 Floor: 19		
19		Judge: The Hon. Martin J. Jenkins		
20   21		Complaint Filed: 12/30/05		
22		FAC Filed: 2/23/06 Trial Date: 7/23/2007		
23		[Fed.R.Civ.Proc. 56]		
24	I, Cara Ching-Senaha, declare on the basis	of personal knowledge:		
25	1. I am an attorney with the law firm of Jackson Lewis LLP, counsel of record for			
26	Defendants NATIONAL RAILROAD PASSENGER CORPORATION dba AMTRAK and JOE			
27	DEELY. I am licensed to practice law in the above-referenced district court. I make the			
28	following statements based on personal knowledge	e.		
	DECL. OF CARA CHING-SENAHA ISO DEF. NAT'L RAILROAD'S NOTICE OF MOT. & MOT. FOR SUMM, J. AND PARTIAL SUMM,			
		The state of the s		

2. I have reviewed in its entirety the transcript for Mr. John Campbell's deposition, taken February 26, 2007. Attached hereto as Exhibit A is an additional page from Mr. Campbell's deposition which is referenced in Defendants' Reply Memorandum.

Executed this 8<sup>th</sup> day of May, 2007 in San Francisco, California. I declare under penalty of perjury under the laws of California and the United States of America that the foregoing is true and correct.

CARA CHING-SÈNAHA

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UNITED STATES DISTRICT COURT
1
                  NORTHERN DISTRICT OF CALIFORNIA
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                               ---000---
 3
     JOHN EARL CAMPBELL,
 4
                Plaintiff,
 5
                                        No. C05-05434 MJJ
 6
     vs.
     NATIONAL RAILROAD PASSENGER )
7
     CORPORATION dba AMTRAK, JOE )
                                            CERTIFIED COPY
     DEELY and DOES 1 through 15 )
8
     inclusive,
                                            JG Jane GROSSMAN
                                           R S REPORTING Services
 9
                Defendants.
10
11
12
13
14
                  DEPOSITION OF JOHN EARL CAMPBELL
15
                           February 26, 2007
16
17
18
19
                      Taken by SHARON TRUJILLO
20
                             CSR No. 6120
21
22
23
                  JANE GROSSMAN REPORTING SERVICES
24
                  1939 Harrison Street, Suite 460
                      Oakland, California 94612
25
                             510.444.4500
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		1	
1	post all open positions?	12:14:14	
2	A. Correct.		
3	Q. And did you routinely look at that board?		
4	A. Yes.		
		12.14.10	
5		12.14.19	
6	this: Did you ever apply for a position, Mr. Campbell,		
7	outside of the Oakland site?		
8	A. No.		
9	Q. Is it fair to say that you weren't interested		
10	in a position outside of the Oakland site?		
11	MS. PRICE: Objection. Vague; overbroad;		
12	vague as to time.		
13	THE WITNESS: Correct.		
14	MS. MAYLIN: Q. And why is that?		
15	A. My mom was handicapped, and I needed to stay	12:14:44	
16	close to home.		
17	Q. Okay. All right. So your the on the		
18	extra boards for approximately a year?		
19	A. Yes.		
20	Q. Okay. After that time, how did your position	12:15:04	
21	change?		
22	A. I had enough seniority to basically hold any		
23	position I wanted.		
24	Q. "Any position" meaning what?		
25	A. I I could bid on any position out of the	12:15:17	